

## IOWA DEPARTMENT OF ENVIRONMENTAL QUALITY

## Report Of Investigation

Page 1 of 1

<b>INVESTIGATION DATE</b>		<b>FROM:</b> IOWA DEPT. OF ENVIRONMENTAL QUALITY (Use REGION NO. 1 Stamp) 209 NORTH FRANKLIN MANCHESTER, IOWA 52057 PHONE 319/927-2640
Current July 29, 1981	Last	
<b>TO: (Facility Name, Location &amp; Address)</b> Chuck Englebert Norplex Division, UOP Inc. Box 445 Postville, Iowa 52162		<b>Persons Contacted (Name &amp; Position)</b> Chuck Englebert, Plant Manager
<b>RE: (Specify Investigation Purpose Or Cite Rule)</b> Hazardous Waste Inspection IAD-073489288		George Stunyo, Envir. Programs
		Hal Fenger, Former Plant Manager
		Polk Burleson, Supt., Engrg. & Maintenance

**OBSERVATIONS/RECOMMENDATIONS**

Norplex Division's plant in Postville, Iowa, is in the business of manufacturing industrial thermosetting plastic laminates. Raw products are mixed and run through heat treaters resulting in a product which is then sanded and cut to finished size. Most of the waste material generated by this process comes off of the head end of the heat treaters where the raw products are first mixed. When enough waste material has collected in the mixing vessels, the wastes are pumped into 55-gallon drums and then stored outside the plant in a hazardous waste storage area.

During this inspection, I examined the facility's hazardous waste management and contingency plan. Some deficiencies were found in the plan covering Waste Analysis, Security, and Inspection. These three areas were being covered by the facility; however, sufficient documentation of how they were handled was not on hand. After discussing these three areas with Mr. Englebert and Mr. Stunyo, management plans were written up to cover them and placed in the management plan book before the inspection was completed. No other deficiencies were noted with the plans.

During inspection of the hazardous waste storage area, only one problem was noted. This area lacks a dike or berm to contain spilled materials. This problem was discussed with Mr. Englebert and Mr. Stunyo at the site, and it was decided that a dike capable of containing 10% of the maximum volume that can possibly be stored in this area will be built as soon as possible. Mr. Englebert agreed to notify me in writing when this job is completed. No other deficiencies were noted during this inspection.

I would like to thank Mr. Englebert and Mr. Stunyo for their cooperation during this inspection.



R00330118  
RCRA RECORDS CENTER

SUSPENSE DATE	Signature	Date
1/1	Inspector Joe P. Sanfilippo	7/31/81
	Regional Administrator Jerry L. Rattenborg, P.E.	7-31-81
<b>Enclosures (Specify)</b>		
<b>Distribution: Regional Office: Central Office: Inspected Facility</b> Date Copy Mailed: 7-31-81		

Company Name Norplex DivisionDate of Inspection July 29, 1981IAD 0 7 3 4 8 9 2 8 8

HAZARDOUS WASTE MANAGEMENT FACILITY General Administrative Requirements Site Inspection Report	Instruction Answer and Explain as Necessary
1. Waste Analysis (265.13) a. <u>Waste Analysis Plan</u> Adequate <input checked="" type="checkbox"/> Inadequate <input type="checkbox"/> b. <u>Waste Analysis Results (operating record)</u> Adequate <input checked="" type="checkbox"/> Inadequate <input type="checkbox"/>	
2. Security (265.14) [if applicable] a. <u>Access Control</u> Adequate <input checked="" type="checkbox"/> Inadequate <input type="checkbox"/> b. <u>Warning Signs</u> Adequate <input checked="" type="checkbox"/> Inadequate <input type="checkbox"/>	
3. Inspection (265.15) a. <u>Inspection Schedule</u> Adequate <input checked="" type="checkbox"/> Inadequate <input type="checkbox"/> b. <u>Inspection Log (operating record)</u> Adequate <input checked="" type="checkbox"/> Inadequate <input type="checkbox"/>	
4. Personnel Training (265.16) a. <u>Position Descriptions</u> Adequate <input checked="" type="checkbox"/> Inadequate <input type="checkbox"/> b. <u>Training Records</u> Adequate <input checked="" type="checkbox"/> Inadequate <input type="checkbox"/>	
5. Preparedness and Prevention Plan (265.30) a. <u>Maintenance and Operation of Facility (265.31)</u> Adequate <input checked="" type="checkbox"/> Inadequate <input type="checkbox"/> b. <u>Required Equipment (265.32)</u> Adequate <input checked="" type="checkbox"/> Inadequate <input type="checkbox"/> c. <u>Testing and Maintenance of Equipment (265.33)</u> Adequate <input checked="" type="checkbox"/> Inadequate <input type="checkbox"/> d. <u>Access to Communications or Alarm Systems (265.34)</u> Adequate <input checked="" type="checkbox"/> Inadequate <input type="checkbox"/> e. <u>Required Aisle Space (265.35)</u> Adequate <input checked="" type="checkbox"/> Inadequate <input type="checkbox"/> f. <u>Arrangements with Local Authorities (265.37)</u> Adequate <input checked="" type="checkbox"/> Inadequate <input type="checkbox"/>	
6. Emergency Procedures (265.56) a. <u>Contingency Plan (265.52)</u> Adequate <input checked="" type="checkbox"/> Inadequate <input type="checkbox"/> b. <u>Instruction on Contingency Plan (training records)</u> Adequate <input checked="" type="checkbox"/> Inadequate <input type="checkbox"/> c. <u>Summary and Details of Implementation of Contingency Plan</u> Adequate <input checked="" type="checkbox"/> Inadequate <input type="checkbox"/>	
7. Waste Accountability a. <u>Manifests - HW Received &amp; Shipped (276.71 &amp; 262.23)</u> Adequate <input checked="" type="checkbox"/> Inadequate <input type="checkbox"/> b. <u>Description &amp; Location of HW within Facility (operating record) (265.73)</u> Adequate <input checked="" type="checkbox"/> Inadequate <input type="checkbox"/>	

8. Groundwater Monitoring (Landfill, Land Treatment & Surface Impoundment)		
a. <u>Groundwater Monitoring Program or Alternate Monitoring Program (265.90)</u>	Adequate <input type="checkbox"/> Inadequate <input type="checkbox"/>	
b. <u>Groundwater Sampling &amp; Analysis Plan (265.92)</u>	Adequate <input type="checkbox"/> Inadequate <input type="checkbox"/>	
c. <u>Outline of Groundwater Quality Assessment Program (265.93)</u>	Adequate <input type="checkbox"/> Inadequate <input type="checkbox"/>	N/A
d. <u>Groundwater Monitoring Results (265.94)</u>	Adequate <input type="checkbox"/> Inadequate <input type="checkbox"/>	
e. <u>(If Applicable) Documentation for Waiver of Groundwater Monitoring (265.90)</u>	Adequate <input type="checkbox"/> Inadequate <input type="checkbox"/>	
9. Unsaturated Zone (Zone of Aeration) Monitoring Plan (Land Treatment Facility) (265.278)		
a. <u>Plan</u>	Adequate <input type="checkbox"/> Inadequate <input type="checkbox"/>	
b. <u>Monitoring Results</u>	Adequate <input type="checkbox"/> Inadequate <input type="checkbox"/>	N/A
10. Closure		
a. <u>Closure Plan (265.112)</u>	Adequate <input checked="" type="checkbox"/> Inadequate <input type="checkbox"/>	
b. <u>Closure Cost Estimate (265.142)</u>	Adequate <input checked="" type="checkbox"/> Inadequate <input type="checkbox"/>	
c. <u>Financial assurance for facility closure (265.143- by 7/13/81)</u>	Adequate <input type="checkbox"/> Inadequate <input type="checkbox"/>	N/A
11. Post-Closure (Disposal Facility)		
a. <u>Post-Closure Plan (265.118)</u>	Adequate <input type="checkbox"/> Inadequate <input type="checkbox"/>	
b. <u>Post-Closure Cost Estimate (265.144)</u>	Adequate <input type="checkbox"/> Inadequate <input type="checkbox"/>	N/A
c. <u>Financial assurance for post closure monitoring &amp; maintenance (265.145-by 7/13/81)</u>	Adequate <input type="checkbox"/> Inadequate <input type="checkbox"/>	
12. Liability Insurance (265.147 - by 7/13/81)		
	Adequate <input checked="" type="checkbox"/> Inadequate <input type="checkbox"/>	

COMPANY NAME Norplex Division DATE OF INSPECTION 7-29-81 IAD 073489288

STORAGE FACILITIES SITE INSPECTION REPORT 13 (Containers)	INSTRUCTION Answer and Explain as Necessary.
A. <u>Condition of Container (265.171)</u>	
<input checked="" type="checkbox"/> Adequate <input type="checkbox"/> Inadequate	
B. <u>Management of Containers (265.173)</u>	
<input checked="" type="checkbox"/> Adequate <input type="checkbox"/> Inadequate	
C. <u>Inspections (265.174)</u>	
<input checked="" type="checkbox"/> Adequate <input type="checkbox"/> Inadequate	
D. <u>Special Requirements for Ignitable Waste (265.176)</u>	
<input type="checkbox"/> Adequate <input type="checkbox"/> Inadequate <input checked="" type="checkbox"/> Not Required	
E. <u>Special Requirements for Incompatible Waste (265.177)</u>	
<input type="checkbox"/> Adequate <input type="checkbox"/> Inadequate <input checked="" type="checkbox"/> Not Required	
F. <u>Security</u>	
<input checked="" type="checkbox"/> Adequate <input type="checkbox"/> Inadequate <input type="checkbox"/> Not Required	
G. <u>Required Emergency Response Equipment</u>	
<input checked="" type="checkbox"/> Adequate <input type="checkbox"/> Inadequate <input type="checkbox"/> Not Required	
H. <u>Containment (264.175)</u>	
<input type="checkbox"/> Adequate <input checked="" type="checkbox"/> Inadequate	
I. <u>Estimated Type and Number of Containers</u>	
45 55-gallon drums	
J. <u>Labeling/Marking on Containers 262.31, 32, 34</u>	
<input checked="" type="checkbox"/> Adequate <input type="checkbox"/> Inadequate	

MAG — JOHN VERDER



iowa department of environmental quality

reply to: Jerry L. Rattenborg - R.O. #1  
phone: 319-927-2640

File Name Norplex Division/HW Facilities

Senders Initials                     

July 31, 1981

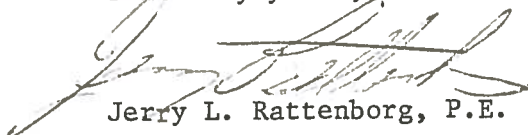
Chuck Englebert, Plant Manager  
Norplex Division, UOP Inc.  
Box 445  
Postville, Iowa 52162

RE: Hazardous Waste Inspection  
IAD - 073489288

Enclosed you will find a copy of the hazardous waste inspection report completed by this office. It is believed the report is self-explanatory. However, should you have any questions, do not hesitate to write or call.

Since this is a relatively new program, the Central Office of DEQ may have some additional comments to forward to you upon their review of this report.

Sincerely yours,

  
Jerry L. Rattenborg, P.E.  
Regional Administrator

JLR:mc  
Enc.

cc: DEQ - Des Moines  
EPA - 324 E. 11th St., Kansas City, Missouri 64106

RECEIVED  
AUG 3 10 00 AM '81  
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